464



PHIFER WIRE PRODUCTS, INC.

P. O. BOX 1700 • TUSCALOOSA, ALABAMA 35403-1700 U.S.A.

■ CHARLES E. MORGAN
Executive Vice President and Corporate Counsel

January 6, 1994

Mr. Todd A. Stevenson Freedom of Information Officer Office of the Secretary U.S. Consumer Product Safety Commission Washington, D.C. 20207

Re: FOIA Request No. 5309032: Phifer Wire Products, Inc. File CA930075 Polymer-Coated Fiberglass Screening

Dear Mr. Stevenson:

Phifer Wire Products, Inc. has no objection to your providing the requestor, Mr. John N. Edwards, with copies of all our CPSC file contents that were enclosed with your November 19, 1993 letter notifying us of his request.

In your notification letter, you point out that we have the right to comment on the information contained in our file. We have only one document to add to the information you already have. I must, however, comment on Mr. Edwards' FOIA request letter dated August 26, 1993 which is, in addition to a request, a submission of information(or misinformation) regarding our fiberglass screening. Since this request letter will, itself, become part of our file, I cannot let it pass without comment.

By way of background, John N. Edwards d/b/a Suntrol Window Products, Inc., hereinafter referred to as "Edwards," has been a Phifer screen dealer for approximately seventeen years. Edwards probably knows as much about the product, including any and all "potential health risks," as we do. We have always shared our research data with him. As soon as we heard the first suggestion that screening might possibly have adverse health effects, we requested a thorough investigation by the University of Alabama School of Public Health. However, the first toxicology study completed on this subject was done by an industrial hygienist in Arizona (Dr. Clifton D. Crutchfield) selected and employed by Edwards. (Please see first sentence on page 3 of Health Effects Group report dated November 25, 1991 that was submitted to the CPSC with our Full Report on June 23, 1993.) Dr. Crutchfield submitted his report to Edwards more than two years ago.

As stated in the report we submitted on June 23, 1993, all scientific data, including data compiled by Phifer as well as by researchers employed by independent and even adverse parties, prove our product to be non-hazardous. Edwards' FOIA request letter implies that he disagrees with

Presidential 'E' Award For Export Excellence
Founded 1952 By REESE PHIFER.

PHONE 205/345-2120 • FAX 205/759-4450 • TELEX 261326 (PHIF UR)

Mr. Todd A. Stevenson January 6, 1994 Page Two

our interpretation of the data. If Edwards' interpretation is correct, his letter is self-incriminating. In the third sentence of that letter, Edwards writes that he is "specifically interested with Phifer's non-compliance under Section 15 that states that a firm must report 'immediately' any potential health risks." Since Edwards has had the research data in hand for more than two years as well as a tremendous amount of first hand experience with the product, it would have been incumbent upon him, as a leading SunScreen dealer, to report "immediately" if there were, in fact or in his opinion, any potential health risks.

Edwards takes credit for assisting "your Phoenix investigator during his investigation here in Arizona." Apparently Edwards attempted to convince your investigator that there is a potential health risk without disclosing to the investigator the full extent and duration of Edwards' knowledge on the subject. In the exhibit attached to the June 17, 1993 memorandum to Dorothy L. Collier from your Arizona Investigator, Zannie E. Weaver, Mr. Weaver notes that he spoke with Edwards on May 26, 1993 and "Edwards still did not mention the work that he had done by Crutchfield" at the University of Arizona in 1991.

The context for Edwards' request may shed some light on his motivation. In March of this year, after doing business with Edwards for seventeen years, we learned from Edwards' employees that Edwards had defrauded Phifer Wire in various ways over a period of (at least) three years. We have now documented more than a dozen incidents of fraud and are involved in a lawsuit against Edwards in which Phifer will prove each one of those incidents of fraud by Edwards. Though Edwards' legal position is weak, he misses no opportunity to attack Phifer Wire Products outside of court. He no doubt hopes to use the information in our CPSC file to continue his attacks, but we have nothing to hide, so please let him have it.

The other major contributor to our CPSC file is Mrs. Mary Golarz of Clarkston, Michigan. Mrs. Golarz attributes her chronic fatigue immune dysfunction to window screening. Unlike Edwards, Mrs. Golarz has never given me any reason to question her honesty or sincerity. However, like any advocate trying to prove a point, she tends to provide only evidence favorable to her position. To complete the file, I am enclosing a copy of a June 9, 1993 report to Mrs. Golarz from Dr. Vaughn E. Wagner in which Dr. Wagner writes that "it is doubtful that there is any direct linkage between your diagnosed Chronic Fatigue Immune Dysfunction and the apparent subchronic exposure to any of the compounds contained in or emitted from the originally installed screening material." I assume Dr. Wagner was employed by Mrs. Golarz, but I do not know Dr. Wagner and have never attempted to communicate with him. We did not have Dr. Wagner's report when we submitted our report to CPSC on June 23, 1993. Please insert Dr. Wagner's report and this letter into our CPSC file.

Sincerely yours,

PHIFER WIRE PRODUCTS, INC.

harles Morgan Charles Morgan

Enclosure

A & E Consulting Services

Environmental & Hazardous Materials Specialists

Vaughn E. Wagner, Ph.D.

4877 Basswood Drive Saginaw, Michigan 48603 (517) 799-0940

June 9, 1993

Mrs. Mary Golarz 6710 Sun Valley Drive Clarkston, MI 48348

Dear Mrs. Golarz:

After reviewing the material sent to my attention, it is doubtful that there is a direct linkage between your diagnosed Chronic Fatigue Immune Dysfunction and the apparent subchronic exposure to any of the compounds contained in or emitted from the originally installed screening material. Given the compounds circumstances described in the documents in your possession, it is hypersensitivity that should be medically investigated to determine if the adverse health effects can be attributed to this type of immune reaction. It is evident that the two routes of exposure primarily impacted are the dermal and respiratory systems. Exposure via these routes to certain chemicals can result in either haptenization of cells in the skin and mucous membranes (Type IV allergenic reactions) or an anaphylactic reaction due to the formation of an antibody (IgE) - antigen complex (Type I allergenic reaction). The former condition is a delayed-type hypersensitivity and can result in contact dermatitis while the latter is an immediate hypersensitivity which usually results in asthma or atopic dermatitis in sensitized individuals.

In addition, photoallergenic reactions cannot be dismissed as a possible source of hypersensitivity as this type of immunological dysfunction also results in a Type IV cell-mediated response. Increased reactivity of the skin to UV and/or visible radiation is produced as a result of a chemically induced photosensitization. Since the coated screens were frequently exposed to sunlight, there might have been absorption of specific wavelengths of light (UV A and or B) by parent or oxidized monomers which resulted in a short-lived, highly reactive excited state molecules capable of converting a hapten to a complete allergen.

SPECIFIC CHEMICAL CAUSAL AGENTS

While numerous chemicals are viable candidates for cell-mediated immune reactions, organic monomers used in the plastics industry have been incriminated by toxicological studies as causal agents.

In reviewing the chemical analyses submitted to me, it is evident that similar type compounds were isolated from the weathered screens. These products were present either as parent compounds or as oxidation products of monomers. The general rule with these type of compounds is that the presence of more than one carboxylic acid group per molecule as well as unsaturated bonds in the carbon skeleton increases corrosivity and toxicity (phthalates and acrylates are examples).

DOSE RELATIONSHIP

It is interesting to note that certain authors used OSHA occupational standards in their discussion of potentially toxic concentrations in residential settings. As was mentioned previously, carbonyl/carboxylic functional groups can induce sensitization in certain individuals. These agents are usually not present in sufficient amounts to induce the allergenic reaction but must be conjugated to a self-protein to result in an allergenic reaction. Since the concentration of the chemical agent causing this immune reaction is usually well under accepted occupational standards, the utilization of threshold limit values calculated on a time weighted average may not be applicable in homes where sensitized individuals reside.

CROSS/MULTIPLE SENSITIVITY

It is important to note that cross/multiple sensitivity can not be ruled out at this time. Cross sensitivity occurs when two or more potential antigens show similar functional groups. In the situation currently under review, a number of compounds were isolated that contained similar functional groups; the carbonyl (ketones and aldehydes) and carboxylic (carboxylic acids and their derivatives) moieties. These functional groups can react in vivo to form reaction products, common metabolites or changes in the carrier proteins. The resultant sequelae may be cross or concomitant sensitization. These adverse reactions may be enhanced if the skin's epidermis (site of active metabolism) biotransforms compounds with similar functional groups to more toxic intermediate epoxides.

CONCLUSION AND RECOMMENDATIONS

While the symptoms you have described are quite extensive. it is evident that the Type IV (delayed hypersensitivity) and Type I (immediate hypersensitivity) are the allergenic reactions of

concern. Further medical investigations are warranted with the carbonyl and carboxylic moieties targeted as prime candidates for inducing allergenic reactions in susceptible individuals. If a sensitivity to these products has manifested itself, practical steps could be taken to minimize exposure to synthetic materials. Examples are: substitute, where possible, natural fibers (cotton, wool) for synthetic ones; replace resin and acrylic finishes with wood and metal materials; and use activated charcoal filtering modular systems on water supplies and air stream sources.

Finally, as to your chronic fatigue immune dysfunction, I would suggest that a determination should be made (if it hasn't already) as to whether the stated condition is a primary or secondary The former is genetic, is genetically acquired immunodeficiency. and can effect specific or nonspecific components of the immune system; the latter is an acquired immunodeficiency, is more common and has a number of causal agents (chemical/nonchemical as well as It is important to note that there is the aging process). literature to indicate increased infection as well as neoplastic conversions associated with the primary immunodeficiency diseases. Once a medical determination has been made as to which category your condition belongs to then specific medical strategies can be designed and implemented to successfully mitigate or improve your condition.

Hopefully, this toxicological review will provide some insights that can aid you in satisfactorily surmounting the medical problems facing you. If you have any further questions please do not hesitate in contacting me.

Sincerely,

Vaughn E. Wagner, Ph.D. Principal Zoxicologist

cc: John Hesse Carl Schier

PHIFER WIRE PROTS A 930075

AND FRUIT TO

MIN PRILER NOTIFIED

No Comme

Him has well recounsed

further notice

OCT 2 6 1993

Charles Morgan Phifer Wire Products, Inc. P.O. Box 1700 Tuscaloosa, AL 35403-1700

Re:

CPSC CA930075

Phifer Wire Products, Inc.

Polymer-coated fiberglass screening

Dear Morgan:

The staff of the Office of Compliance and Enforcement, U.S. Consumer Product Safety Commission, has completed its review of the information concerning your firm's polymer-coated fiberglass screening.

Based upon the information currently available, the staff does not believe the nature and degree of the risk of injury presented by this product necessitate action by the Commission under Section 15 of the CPSA.

Should the firm receive any information that indicates that the risk of injury or hazard presented by the product is greater than or different from that indicated by the information it has already supplied the Commission, it must report that information to the Division of Corrective Actions pursuant to section 15(b) of the CPSA immediately.

The firm has previously indicated that it has voluntarily implemented a program to address the reported problem. The staff acknowledges the actions which Phifer Wire Products has taken willingly and voluntarily. Such actions by firms add greatly to the level of safety of consumer products in the market.

The Commission publishes a list of product recalls and other corrective actions initiated by firms in an Annual Report to Congress. This information is also occasionally used in lists for specific product categories. A summary of the firm's

corrective action is enclosed. Because the corrective action is being taken voluntarily and in the absence of a preliminary staff determination that this product presents a substantial product hazard, the firm's agreement to include its corrective action in Commission publications is purely voluntary on the firm's part. Unless the firm notifies the staff by telephone or letter within thirty (30) days of the date of this letter, the staff will assume the information in the enclosed summary is accurate and that the firm does not object to its publication. Please reference the CPSC file number in your response.

If you have any questions concerning this letter, you may contact Judith Hayes, Division of Corrective Actions, U.S. Consumer Product Safety Commission, 5401 Westbard Avenue, Room 240, Washington, D.C. 20207, telephone: (301) 504-0608. Thank you for your cooperation in this matter.

Sincerely yours,

Marc J. Schoem Director Division of Corrective Actions

Certified Mail

Enclosures
Corrective Action Summary

Cc: Consumer Product Safety Commission
 Central Regional Center
 Suite 2945
 230 S. Dearborn St.
 Chicago, IL 60604

Judith Hayes, CECA

Voluntary Corrective Action Plans Under Section 15 of the Consumer Product Safety Act and Section 15 of the Federal Hazardous Substances Act

The following is a list of voluntary corrective action plans recently accepted by the Commission (or the staff acting under authority delegated by the Commission). A firm's taking corrective action does not constitute admission by the firm that a substantial product hazard exists.

Space does not permit the staff to give a complete list of the specific model numbers of the products involved in each of these corrective actions. Consumers who believe that they have a product affected by one of these actions should follow the instructions given in this list or contact either the manufacturer or the Commission to determine if their product is one of those affected.

Voluntary Corrective Action Plans Under Section 15 of the Consumer Product Safety Act and Section 15 of the Federal Hazardous Substances Act

Date	Firm and Product	Alleged Hazard	Remedy
10/93	Phifer Wire Products Tuscaloosa, AL 35403-1700	The screens have the potential to degrade when exposed to excessive sunlight and heat.	The firm is offering replacement screens to consumers.
	Polymer-coated fiberglass window screening produced 1988 to 7/89.		

COPULA 1/8/93

Judith Hayes, C.O. CECA

Marc J. Schoem, Director, CECA

David Schmeltzer, AEDCE

Eric C. Peterson, Executive Director

Jerry G. Thorn, General Counsel

Congressman Jon Kyl
Congress of the United States
c/o Mrs. Marilyn Stuckwisch
Phoenix District Office
4250 East Camelback Road
Suite 140-K
Phoenix, AZ 85018

Dear Mrs. Stuckwisch:

This letter is in response to Congressman's Kyl correspondence of June 23, 1993, on behalf of his constituent Mr. John N. Edwards.

Our staff is in the process of investigating the matter of the alleged defective sunscreens manufactured by Phifer Wire Products, Inc. The material submitted by Mr. Edwards in his June 15, 1993, letter to Congressman Kyl will be included in our review. At the conclusion of our staff's assessment, a further determination will be made as to appropriate Commission actions.

If there are any further questions, please do not hesitate to contact the Commission again.

Sincerely,

Edward D. Harrill Director Office of Congressional Relations



PHIFER WIRE PRODUCTS, INC.

P. O. BOX 1700 • TUSCALOOSA, ALABAMA 35403-1700 U.S.A.

CHARLES E. MORGAN Executive Vice President and Corporate Counsel

June 23, 1993

Mr. Marc J. Schoem

EXPRESS MAIL RETURN RECEIPT REQUESTED

Director

Division of Corrective Actions
U.S. Consumer Product Safety Commission
5401 Westbard Avenue - Room 240
Washington, DC 20207

Re: CPSC CA930075

Phifer Wire Products

Polymer (PVC) Coated Fiberglass Screening Material

Dear Mr. Schoem:

This is in response to your June 4, 1993 letter addressed to Mr. Anthony Gambel which I received on June 14, 1993. As you requested, I have prepared and enclosed the "Full Report" information specified by 16 C.F.R. §1115.13(d)(1) through (14) and the additional information specified as 15a through 15g beginning on page 2 of your letter.

We do not consent to the release of the information provided herewith. Please note that we received an FOIA request dated April 23, 1993 from Mr. Todd A. Stevenson of the U.S. Consumer Product Safety Commission. With my response, I provided scientific data and wrote that Phifer would not object to disclosure of the information to anyone who might request it. A copy of that letter and my response are enclosed. If the additional information we are providing today can be disclosed (despite our request that it not be disclosed), please protect the confidentiality of all enclosed commercial and financial information (item (3) on page 1 and item (7) on page 2 of "Full Report") which I have marked "CONFIDENTIAL."

In your letter you mention receiving information regarding a product recall by Phifer. We did not recall the product, but we did have and continue to have an aggressive warranty replacement program in response to problems with the appearance of some of the products we manufactured in 1988-89. We were several years into that replacement program when questions were first raised about possible health effects of screen odors. We immediately employed a leading toxicologist to research the question and independent studies were commissioned by persons (a screen dealer and a consumer) who raised the health question. All the research shows that our product, whether brand new or in a defective degraded condition, does not off-gas toxic fumes. Copies of all known research data on this question are enclosed.

Foundation 15 Amont For Export Economics
Foundation 1952 By REESE PHIFER

PHONE 205/345-2120 • FAX 205/759-4450 • TELEX 261326 (PHIF UR)

Mr. Marc J. Schoem June 23, 1993 Page Two

When the health question came op we did consider the possibility of a recall, but determined that it was not justified because of the very low frequency of reports of adverse reactions to the product, the uncertainty of a causal connection between the product and symptoms reported, and the relatively mild nature and short duration of symptoms reported.

As stated in our "Full Report" in reference to \$1115.13(d)(11), there were several negative, inaccurate and highly sensationalized news reports on our product. These reports erroneously described our product as "toxic." These broadcasts were repeated for several days at prime news hours in two major media markets. We expected to be inundated with health claims from consumers in those areas but only a small number of complaints has been received. Your own records may support our position - your toll-free telephone number was read and displayed at the end of those sensationalized television reports in Phoenix and Detroit; if our product poses any health risk, you would have received thousands of calls by now.

Following those reports, the scientists who conducted the research upon which the television reports were supposedly based, made themselves available to reporters and health officials to explain their test data. After discussions with these scientists, reporters and officials were apparently convinced that our product poses no health risk because there were no negative follow-up stories or findings by state officials.

If you need additional information, please contact me instead of Mr. Gambel.

Sincerely yours,

PHIFER WIRE PRODUCTS, INC.

Charles Morgan
Charles Morgan

CM:jh

Enclosures

P.S. The retail product sample packages are being mailed under separate cover with a copy of this letter enclosed.



SAMPLE ORDER ENTRY

No. 00950

Phone: 205/345-2120 • Toll Free 1/800-633-5955 • FAX 205/759-4450 • Telex: 261326 (PHIF UR)

DATE:

June 23, 1993

SOLD TO:

Mr. Marc J. Schoem

SHIP TO: U.S. Consumer Product Safety

5401 Westbard Avenue Room 240

Washington, DC 20207

CODE	DESCRIPTION	QUANTITY SHIP.	PRICE
	SUNSCREEN CCL 36 x 84		N/C
	PG 18 x 16 Silvergrey 36 x 84		3/0
.	•		
	·		
•	PLEASE SHIP OVERNIGHT UPS		
	ASAP		
	·		
	,		

		İ
REQUESTED BY Terry White	DATE SHIPPED 3 75	SHIPPED VIA:
APPROVED BY Jun Julius	CUSTOMER PICKUP	MOTOR FREIGHT
AFFROVED BY	<u>X</u> UPS	PARCEL POST
SHIPPED BY	BUS	AIR
	PACKING SLIP	777800029A Rev. 5/92.

ſ	<u>U.S. CONSUME</u> SAMPLE	E COLLECTION REP			
. Flag			[3_Sample type & number [[] Physical [[_] Documentary		
4a. Product name	[4b. Model	4c. NEISS		
6. Complete for import a. Port of Entry b. Entry # & date c. Country of Origin d. HSUSA code	:		į į	8. Hours: a.Activity b.Travel [9b. Collecting RC	
e. Customs Contact 10. Sample Cost	: [11. Invoice	value of lot	[12. Size of	_[lot	
<pre>13. Manufacturer/Import ID =</pre>		ipper/Foreign Mfr	[r/Import Broker	
16. Supporting document	ID#		ID#		
a. Invoice # & date: c. Shipping record # &			b. Date S	hipped:	
d. Affidavit signer's		date:			
18. Reason for collections of Field Sc. 20. Sample Size, Method	reening:		CPSAFFA	PPPA RSA	
21. Identification on s	ample	[22. Identificati	on on seal		
23a. Sample delivered to	9	[23b. Date [24. Orig. re	port/records sent to	
25. Laboratory/Office: 26. Remarks	ESEL [] HS	HL[]CERM[]	CECA [] O	THER []	
27. Related Samples					
27. Related Samples 28a. Collector's name,	title & emplo	yee # [28b. Colle	ector's signa	ture & date	
29a. Reviewer's name, t	itle & employ	ee # [29b. Review [er's signatu	re & date	
Distribution: Orig [] CPSC Form 166 (Rev. 9/9)	Lab [] Fi	scal [] Data [] Hdqtr []	Other []	

	U. S. CONS	UMER PROI	OUCT SAFETY	MISSION	
1. Region	JAMPLE COLLI	[2. Dat	ORT CONTINU	JALLON SHEET [3. Sample	
1. Region		[.е	[J. Sample	number
		[[
4. Additional inform	ation				
					•
				•	
·					
					-
			•		
	,	•			
		-			
	•				
			•		
5. Collector's name	[6	. Title		7. Signatur	e ·
	Ī			. -	
CPSC Form 166a (Rev.	9/91)			·	



U.S. CONSUMER PRODUCT SAFETY COMMISSION

WASHINGTON, D.C. 20207

April 23, 1993

President
Phifer Wire Products, Inc.
P.O. Box 1700
Tuscallosa, AL 35403-1700

RE: FOIA Request S-304051: Window Screens

Dear Sir or Madam:

The Consumer Product Safety Commission has received a request under the Freedom of Information Act (FOIA) for certain records. We have identified the enclosed records pertaining to your firm or the firm you represent as responsive to the FOIA request. The Commission has not yet made a determination whether to disclose these records. We are sending you the material so you may comment on the information in the records under the procedures in section 6(b) of the Consumer Product Safety Act (CPSA). That section requires the Commission to provide the opportunity to comment on certain information from which the identity of a manufacturer, private labeler or importer of a consumer product may be readily ascertained by the public. comments you submit pertaining to the information will be considered during our processing of the records for release in response to the FOIA request. Prior to disclosure of the requested information, the Commission will determine reasonable steps to be taken, if necessary, to fulfill the requirements of section 6(b)(1) of the CPSA. You may also request confidential treatment of information in accordance with section 6(a)(3) of the CPSA. To assist you we have enclosed the appropriate portions of the CPSA and its implementing regulations.

Please note that the records to be disclosed also may include documents (not provided here) that identify your firm or the firm you represent which were previously cleared for public release in accordance with the Commission's disclosure regulations and for which you or your legal representative did not request, in writing, renotification for future disclosures of that same material (see Commission regulation at 16 C.F.R. § 1101.31(d)).

To assist the Commission in evaluating the accuracy of the information contained in the records your comments on the enclosed material must be specific and supported by documentary evidence, where available. You should also include with your comments all explanatory data or other relevant information for the Commission's consideration. Please note that the Commission considers broadly expressed comments that lack specific supporting information insufficient to sustain claims of inaccuracy or objections to disclosure.

If the Commission decides to disclose information after its review of the information, taking into consideration your comments, the Commission may also release to the public your comments (or a summary thereof) unless you request that your comments (or portions) not be released. Our disclosure letter to the requester will also include, if appropriate, explanatory statements to put the information into the proper context. These statements may be based, in part, on your comments. Therefore, please be specific and let us know if there is any other information on this matter of which we should be aware.

You should also be aware that we often receive multiple requests for the same information. To avoid overburdening manufacturers, after initially seeking section 6(b) comments, we do not customarily send each subsequent request for information to the manufacturer unless the manufacturer specifically requests subsequent notice. In your comments, therefore, please advise us if you desire to receive section 6(b) notice for each request for identical information.

To permit full consideration your written comments must be received within twenty calendar days of the date of this letter with three additional days allowed if you receive the material by mail. Comments should be sent to Freedom of Information Officer, Office of the Secretary, U.S. CONSUMER PRODUCT SAFETY COMMISSION, Washington, D.C. 20207. Please refer to the FOIA request number.

If you have no comments or objections to the public disclosure of these records, you are not required to respond. Should you have any questions, contact Patricia Chisley, FOI Specialist, by letter, facsimile (301) 504-0127 or telephone (301) 504-0785. Thank you for your assistance.

Todd A. Stevenson

Freedom of Information Officer

Office of the Secretary

Enclosures



PHIFER WIRE PRODUCTS, INC.

P. O. BOX 1700 . TUSCALOOSA, ALABAMA 35403-1700 U.S.A.

CHARLES E. MORGAN Executive Vice President and Corporate Counsel

May 11, 1993

Freedom of Information Officer
Office of the Secretary
U.S. CONSUMER PRODUCTS SAFETY COMMISSION
Washington, DC 20207

Re: FOIA Request S-304051:Window Screens

Dear Sir or Madam:

This is in response to your April 23, 1993 letter on the above referenced request. Phifer Wire Products, Inc. has no objection to disclosure of the requested information. We would, however, like to receive notification of any subsequent requests.

There has been extensive analysis done on our product. I have enclosed a complete copy of a report by Dr. Clifton Crutchfield which summarizes the results of four independent research studies on the safety of our screening material manufactured during 1988 and 1989. I have also enclosed a short statement from Dr. Robert G. Meeks summarizing the results of research conducted on our current production material, i.e., material that was manufactured between 1989 and the current date. If you should receive any consumer complaints or requests for information on this subject, please forward them copies of these enclosures.

Sincerely yours,

PHIFER WIRE PRODUCTS, INC.

Charles Morgan
Charles Morgan

CM:jh

Enclosures

Procured T Augu F for Export Excelor

Founded 1952 By REESE PHIFER

PHONE 205/345-2120 • FAX 205/759-4450 • TELEX 261326 (PHIF UR)

PROJEST FOR FIELD SERVICES - SHORT TERM

REQUEST FOR	FIELD SERVICES - SHORT TERM					
DATE: JUN 9 1995	issuance:93XXX4STICO					
TO: Lee Baxter, Director,						
THROUGH: AL Roma, AEDFO	nt .					
FROM: Marc J. Schoem, Dir	ector, CECA PRIORITY: Routine					
CONTACT: Judith Hayes, C.	O. CECA TARGET: 2 weeks after assignment date					
PHONE: 301-504-0608	ESTIMATED MANHOURS: 8 hours					
	of Complaints ona Dept. of Health					
Phi Tus	CC CA930075 fer Wire Products scaloosa, AL sduct: Sun Screen					
BACKGROUND:						
Phifer Wire Products manufactured a household window screen product that was designed to block out a certain amount of sunlight. Staff has received copies of consumer complaints and tests analyses alleging that the subject product emits toxic fumes during use that may cause adverse health effects. Recently, staff was informed that Phifer recalled the subject screens, however, made statements to the news media that the screens were recalled due to poor quality.						
FOWR investigator Zannie Weaver is knowledgeable of staff's investigation. Mr. Weaver has had contact with Chief Norman Peterson of the Arizona Department of Health, Office of Risk Assessment and Investigations, who is aware of 12 additional complaints regarding the subject screen.						
TO BE F	ILLED IN BY AREA OFFICE					
DATE COMPLETED:	COMMENTS:					

MANHOURS ACTUALLY REQUIRED:

TRAVEL TIME REQUIRED: _

14

REQUEST:

Staff requests that Investigator Weaver collect copies of the complaints from Chief Peterson in addition to any other pertinent information that the Chief and his office may be aware of concerning this investigation. Information to be forwarded to Judith Hayes, CECA.

This STI discussed with Dorothy Collier, FOWR.

☆ U.S. GOVERNMENT PRINTING OFFICE:1992-322-77

ر المراكب المستقيد المراكب المراكب المراكب المراكب المراكب المراكب المراكب

1. STORAGE LOCATION			1	OF PRODUCT	_	Material	3. SAMPLE NO.			
A.	C.				P-793-0279			9		
	- 1				AND ADDRESS C					
8.	B. D.			Phi	lfer Wire	Products,	Inc			
			PO	PO Box 1700 Tuscaloosa, AL 35403-1700						
5. DATE SAMPLE RECEIVED				6. BY WH	6. BY WHOM RECEIVED 7. DATE RECORDS RECEIVED					
6-25-93			Judy Hayes							
8. A. PERSONALLY FF			LY FROM			C. SHIPPED FRO	OM			
METHOD				1		Co				
OF	B. VIA			رب سیمید در بخشین	D. SHIPPING RECORDS (Ty			vne and Identity)		
SHIPMENT	UP	s						,,		
9.			TYPE	PVC Coated Screening Material			CONDITION			
DESCRIPTION			2 roll	s PVC	Coated S	creening N	Material			
OF	B. SAMPLE NUMBER PACKAGES		NUMBER	SIZE, TY				CONDITION		
SHIPMENT				(Fibe	rglass					
3.77, 11.210	C. SEAL COPY IN FULL					CONDITION				
	INSCRIP									
		10. S	AMPLE DELIVE	RY			11. SAMPLE RE	TURNED		
DATE		AM	OUNT	FROM	то	DATE	AMOUNT	ТО	FROM	
12A. SAMPLE DISPOSITION								B. BY WHOM	C. DATE	
CPSC FORM N	0.150.15	514 -								
CF3C FORM N	U. 159 (R	EV. 4	7771				SAME	PLE ACCOUNTABILI (Custodian Cop		

SENDER: • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so the return this card to you. • Attach this form to the front of the mailpiece, or on the back if does not permit. • Write "Return Receipt Requested" on the mailpiece below the article of the return Receipt will show to whom the article was delivered at delivered.	ispace 1. Addressee's Address 3
3. Article Addressed to: Mr. Anthony Gamble Phifer Wire Products P.O. Box 1700 Tuscaloosa, AL 35403-1700	4a. Article Number 4b. Service Type 4b. Service Type Certificat COD Express Mail Return Receipt for Merchandise 7. Date of Delivery
5. Signature (Addressee) 6. Signature (Agent) PS Form 3811, December 1991 * U.S. J.P.O.: 1992-307-	8. Addressee's Address (Only if requested and fee is paid)

JUN 4 1823

Mr. Anthony Gamble
Phifer Wire Products
P.O. Box 1700
Tuscaloosa, AL 35403-1700

Re:

CPSC CA930075
Phifer Wire Products
Polymer coated fiberglass

screening material

Dear Mr. Gamble:

The United States Consumer Product Safety Commission (Commission) is an agency of the United States government responsible for the enforcement of the Consumer Product Safety Act (CPSA), 15 U.S.C. § 2051 et seq. for consumer products manufactured, distributed, or imported into the United States.

The Commission staff is in the process of investigating information concerning complaints that the subject window screen material has the potential to off-gas toxic fumes that allegedly have caused adverse health effects to several consumers. Additionally, we have been informed that Phifer Wire Products recently recalled this product.

Enclosed for your information are the Consumer Product Safety Act and the Commission's regulation entitled, "Substantial Product Hazard Reports," 16 C.F.R. Part 1115. These documents explain the Commission's authority and policy with regard to products which may present substantial product hazards and also explain the firm's rights and obligations under the Act to furnish information to the U.S. Consumer Product Safety Commission.

The Division of Corrective Actions has the responsibility to determine preliminarily whether a defect is present in a product and, if so, whether that defect rises to the level of a substantial product hazard as defined by section 15(a) of the Consumer Product Safety Act (CPSA), 15 U.S.C. § 2064(a).

Information Requested

For the staff to assess accurately the potential hazard associated with the firm's product, if any, it requires certain information from the manufacturer or importer of this product. Please provide the "Full Report" information specified by 16 C.F.R. § 1115.13(d) (1-14) on pages 35,001-02 of the enclosed Federal Register notice. In your response, please reference each question number (1-14).

In addition to providing the information requested in 16 C.F.R. §1115.13(d) (1-14), paragraph 15 of the "Full Report" requests any additional information needed by the staff. In accordance with paragraph 15 (see page 35,002), please also provide the following additional information:

- 15a. Copies of all test reports, analyses, and evaluations, including premarket tests and reports of tests and any analyses related to the reported problem. Include the date and place such tests and analyses were conducted by or on behalf of the firm and the identity of the persons involved in the testing and analyses.
- 15b. Copies of all engineering drawings, engineering change notices and material specifications relevant to the identified problem.
- 15c. The identity of the person(s) who identified the potential problem, the date he/she identified the problem, any persons they notified, and the date of notification.
- 15d. Concerning the information specified by 16 C.F.R. §1115.13(d)(6), please include a copy of all safety related consumer or dealer complaints, warranty claims, reports of injury, and copies of all documents related to such complaints, claims and injuries. Please include, copies of all court complaints and related documents filed in or associated with lawsuits involving the product and a description of the resolution of those lawsuits, if any.
- 15e. Provide one sample of the product, including retail packaging and instructions for assembly and use. Also provide a sample of the "fix," if such has been made, with instructions to be given to consumers.